

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF
AMERICA

v.

EDMOND LAFRANCE,

Defendant.

CRIMINAL No. 16-CR-10090-IT

JOINT MEMORANDUM FOR FINAL STATUS CONFERENCE

The parties submit this joint memorandum addressing the issues set out in Local Rule 116.5(c).

(1) Transfer of Case to the District Court:

There are no additional matters that need to be addressed by the Magistrate Judge and the parties jointly request that this case be returned to the District Judge and scheduled for pretrial conference in the next 30-45 days.

(A) Discovery

The government has produced all pretrial discovery which it has identified to date. It will produce any subsequently identified discovery in accordance with the schedules established by Local Rules 116.1 and 116.2. The discovery material in this case, both hard copy and electronic, is extensive, and the defense will require time to review this material and discuss it with the client.

(B) Outstanding Discovery Requests:

There are no outstanding discovery requests or motions at this time.

(C) The Timing of Any Pretrial Motions Under Fed. R. Crim. P. 12(b):

There are no pending motions under Fed. R. Crim. P. 12(b).

(D) Excludable Delay:

All days since the time of the defendant's arrest have been excluded pursuant to the Speedy Trial Act. The defendant agrees to the continued exclusion of time under the Speedy Trial Act for discovery review and contemplated motion practice on "interests of justice" grounds.

(E) Estimated Length of Trial:

Trial of this case should last approximately 7-8 days.

(3) Additional Matters:

There are no other matters specific to the particular case that would assist the District Judge upon transfer of the case from the Magistrate Judge. There remains an open and unresolved issue relative to the Defendant's motion to modify his conditions of release to remove the prohibition on his use of and access to the internet. (ECF 54.)

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By: /s/ Stephen P. Heymann
Stephen P. Heymann
Assistant U.S. Attorney

/s/ Paul Kelly & John Commisso by sph
Paul Kelly
John Commisso
Counsel for Defendant Edmond LaFrance

Date: September 7, 2016

Certificate of Service

The undersigned certifies that a copy of this Joint Memorandum has been served on counsel of record through the electronic case filing system.

/s/ Stephen Heymann
Stephen Heymann